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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and on behalf of themselves and all others similarly situated,
 	
        Plaintiffs,
 	
        v.
 	
GOOGLE LLC,
 	
        Defendant.
	Case No. 4:20-cv-03664-YGR-SVK
	
	DECLARATION OF JOSEPH H. MARGOLIES IN SUPPORT OF GOOGLE LLC'S ADMINISTRATIVE MOTION TO SEAL PORTIONS OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT (DKT. 1096)
	
	Judge: Hon. Yvonne Gonzalez Rogers

1   I, Joseph Margolies, declare as follows:

2   1.   I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, counsel for

3 Defendant Google LLC ("Google") in this action. I make this declaration of my own personal,

4 firsthand knowledge, and if called and sworn as a witness, I could and would testify competently

5 thereto.

6   2.   Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google's

7 Administrative Motion to File Under Seal Portions of Plaintiffs' Unopposed Motion for Final

8 Approval of Class Action Settlement (Dkt. 1096) ("Settlement Approval Motion"). In making this

9 request, Google has carefully considered the relevant legal standard and policy considerations

10 outlined in Civil Local Rule 79-5. Google makes this request with the good-faith belief that the

11 information sought to be sealed consists of Google's confidential and proprietary information and

12 that public disclosure could cause competitive harm.

13   3.   I have reviewed the Settlement Approval Motion, and based on my review, there is

14 good cause to seal the following information, for the reasons identified in the table below:

Document(s) to be Sealed	Basis for Sealing
Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement (Dkt. 1096) Highlighted Portions at: pp. 13:18, 15:20–28	The information requested to be sealed contains Google's highly confidential and proprietary information regarding sensitive features of Google's internal systems and operations, including Google's internal project names and internal financial and user metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1   4.   Google's request is narrowly tailored in order to protect its confidential information.

2 These redactions are limited in scope and volume. Because the proposed redactions are narrowly

3 tailored and limited to portions containing Google's highly confidential or confidential information,

4 Google requests that the portions of the aforementioned documents be redacted from any public

5 version of those documents.

6   5.   Google does not seek to redact or file under seal any of the remaining portions of the

7 Settlement Approval Motion not indicated in the table above.

8   I declare under penalty of perjury of the laws of the United States that the foregoing is true

9 and correct.

10   Executed in Bayside, Wisconsin on April 5, 2024.

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12   By   */s/ Joseph Margolies*
              Joseph Margolies

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MARGOLIES DECLARATION ISO ADMINISTRATIVE MOTION TO SEAL